

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,	:	
	:	
vs.	:	CRIMINAL CASE
	:	No. 1:05-CR-543 (JEC)
RICHARD ONG	:	

PRELIMINARY MOTION TO SUPPRESS EVIDENCE

NOW COMES DEFENDANT, RICHARD ONG, by and through undersigned counsel, and files this Preliminary Motion to Suppress Evidence and shows as follows:

1.

Mr. Ong moves to suppress all statements allegedly made by him in that said statements were not voluntary. Miranda v. Arizona, 384 U.S. 436-468, 69 (1966), Jackson v. Denno, 378 U.S. 368, 376-377 (1984).

2.

Mr. Ong moves to suppress any and all evidence seized from him home in violation of the Fourth Amendment to the United States Constitution.

WHEREFORE, Mr. Ong respectfully requests this Motion be granted, or in the alternative, requests a pre-trial hearing on the voluntariness of any

statements allegedly made by him and a hearing on whether any evidence was illegally obtained.

This 31st day of January, 2007.

Respectfully submitted,

/s/ Sandra Michaels

Sandra Michaels

Georgia Bar No. 504014

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CERTIFICATE OF SERVICE

This is to certify that the foregoing pleading has been formatted in New Times Roman 14 pt. and was electronically filed this day with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

Stephanie Gabay-Smith, AUSA
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This 31st day of January, 2007.

/s/ Sandra Michaels
Georgia Bar No. 504014
Counsel for Mr. Ong